

EXHIBIT 2

Page 1

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
-----X
VIRGINIA L. GIUFFRE,

Plaintiff/ Counterclaim Defendant,

-v-

19-cv-03377-LAP

ALAN DERSHOWITZ,
Defendant/ Counterclaim Plaintiff.

-----X

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X

DAVID BOIES,
Plaintiff/ Counterclaim Defendant,
-v-
Index No.:
160874/2019

ALAN DERSHOWITZ,

Defendant/ Counterclaim Plaintiff.

-----X

DATE: December 16, 2020
TIME: 10:00 A.M.
VIRTUAL VIDEOTAPED EXAMINATION
BEFORE TRIAL of JOHN ZEIGER, taken by MR.
COOPER, pursuant to Subpoena, held at the
offices of Hindy Kaplan, a Notary Public of
the State of New York.

1 J. ZEIGER

2 A. I do not.

3 Q. Was if more than once?

4 A. Yes.

5 Q. Do you have any awareness of
6 whether professor Dershowitz spoke at any
7 time with Abigail Wexner?

8 A. Yes.

9 Q. Professor Dershowitz told you
10 that he had spoken to her and she directed
11 him to you, correct?

12 A. Correct.

13 Q. And professor Dershowitz also
14 told you that Abigail Wexner had referred
15 to the efforts of the Boies Schiller firm
16 as extortion, correct?

17 MR. BOIES: Objection.

18 A. No. That's simply not true.

19 MS. PROCTOR: Join.

Figure 1. The effect of the number of clusters on the classification accuracy of the proposed model. The proposed model is compared with the KNN classifier.

ANSWER The answer is (A). The first two digits of the number 1234567890 are 12.

ANSWER The answer is (A). The first two digits of the number 1234567890 are 12.

 [REDACTED]

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The figure consists of a 10x10 grid of black bars. Each bar's length represents a data value. A vertical scale bar is positioned on the left side of the grid, and a horizontal scale bar is at the top. The bars are arranged in a pattern where their lengths increase along a diagonal line from the bottom-left corner towards the top-right corner, indicating a positive correlation or trend across the data set.

14 Q. Now, sir, you responded a few
15 minutes ago to a question about -- that I
16 asked about professor Dershowitz informing
17 you of a conversation with Abigail Wexner
18 by saying that Ms. Wexner had never used
19 the word extortion with professor
20 Dershowitz. So let me just follow that up.

21 Were you participating at any
22 point in time in a call between professor
23 Dershowitz and Mrs. Wexner?

24 A. No.

25 Q. So I take it you have no

1 J. ZEIGER

2 personal knowledge as to what was or was
3 not said on any call between the two, if
4 indeed one took place?

5 A. I'm afraid that any personal
6 knowledge I had about what Mrs. Wexner said
7 about the call would be privileged.

8 Q. So you previously said that it
9 wasn't true. What was the basis for your
10 statement?

11 A. Other than the privileged
12 material, I can't go into. I know that you
13 suggested that Alan had said in that phone
14 call to me that there had been and
15 extortion attempt or shake down attempt. I
16 know Alan did not say that to me. To the
17 contrary, none of us of ever heard of the
18 so called shake down or extortion theory
19 until Alan called me that day and went into
20 the after he had talked to Mrs. Wexner. He
21 raised it, we didn't.



1 J. ZEIGER

2 Q. And so did you -- in the
3 conversations that you had with
4 Mr. Dershowitz, who initiated the first
5 call?

6 A. Mr. Dershowitz.

7 Q. And in your first conversation,
8 did he already know about the allegations
9 made against Leslie Wexner, to your memory?

10 A. I remember that in that first
11 conversation he had called Les Wexner, had
12 not reached him. Mrs. Wexner returned the
13 call, told him to call me. He called me
14 and started explaining the extortion theory
15 and the information he had to back it up.

Category	Number of Samples
0	1
1	1
2	1
3	0
4	1
5	0
6	1
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8	1
9	1
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